Thomas Freedman Jr. (OSB No. 080697) thomas@prllaw.com **Pearl Law LLC**

552 SW 5th Avenue, Suite 1100

Portland, Oregon 97204

Tel: (503) 295-6296 | Fax: (503) 295-6344

Valentin Gurvits (pro hac vice) vgurvits@bostonlawgroup.com Matthew Shayefar (pro hac vice) matt@bostonlawgroup.com Boston Law Group, PC

825 Beacon Street, Suite 20

Newton Centre, Massachusetts 02459

Tel: (617) 928-1800 | Fax: (617) 928-1802

Sean Ploen (pro hac vice) sploen@ploen.com

Ploen Law Firm, PC

100 South Fifth Street, Suite 1900

Minneapolis, MN 55402

Tel: (651) 894-6800 | Fax: (651) 894-6801

UNITED STATES DISTRICT COURT DISTRICT OF OREGON – PORTLAND DIVISION

CALISTA ENTERPRISES LTD.,

a Republic of Seychelles company,

Plaintiff/Counter-defendant,

- V. -

TENZA TRADING LTD.,

a Cyprus company,

Defendant/Counterclaimant.

Case No. 3:13-cv-01045-SI

ATTORNEY DECLARATION & EXHIBIT

- I, Thomas Freedman, declare and state as follows:
- 1. I am local counsel for Plaintiff Calista Enterprises Ltd. in the above-captioned matter.
 - 2. Attached hereto as **Exhibit A** are true and correct copies of excerpts from the

Transcript of the Telephonic Discovery Conference Before The Honorable Michael H. Simon on

Val Gurvits | Matthew Shayefar | Boston Law Group, PC 825 Beacon Street, Suite 20 | Newton Centre, MA 02459 617-928-1800 | vgurvits@bostonlawgroup.com | matt@bostonlawgroup.com Page 1

January 31, 2014.

3. This motion is filed in good faith, and not for purposes of harassment, delay or any other improper purpose.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing 4.

is true and correct.

Dated: February 27, 2014

By: <u>/s/ Thomas Freedman</u>
Thomas Freedman, OSB No. 080697